Westar Energy®

October 4, 2012

Mr. Mark Smith,
Chief, Air Permitting and Compliance
United States Environmental Protection Agency
Region 7
901 North 5th Street
Kansas City, Kansas 66101

RE: Jeffrey Energy Center – NSPS Subpart D Alternative Opacity Monitoring Plan

Dear Mr. Smith:

On April 20, 2012 your office approved Westar Energy, Inc.'s (Westar's) interim New Source Performance Standard (NSPS) Subpart D Alternative Opacity Monitoring Plan (NSPS AOMP) request for Jeffrey Energy Center (JEC) Unit 1. EPA's approval provided for the use of the JEC3 CAM compliance indicators until a new NSPS AOMP is approved for JEC Unit 1.

Westar is seeking EPA approval of the use of the newly developed CAM plan in lieu of the April 20, 2012 approved interim NSPS AOMP. This CAM Plan will represent the new NSPS AOMP. A table summarizing the proposed monitoring is included in Attachment A. In addition, a copy of the proposed CAM Plan is included in Attachment B.

Please note that the substance of the requested NSPS AOMP has not changed. The proposed plan still consists of FGD Liquid to Gas Ratio (L/G) monitoring, ESP transformer-rectifier sets (TR-sets) out of service monitoring and periodic qualitative opacity assessments.

To eliminate significant confusion, Westar requests that compliance with the new NSPS AOMP coincide with the compliance date established by KDHE for the new CAM Plan (i.e., Westar shall continue complying with the current NSPS AOMP until such date as KDHE requires compliance with the new CAM plan).

Should you have any questions, or need additional information please contact me at 785-575-8447.

Sincerely,

WESTAR ENERGY, INC.

Stephanie Hirner
Supv., Air Permits and Compliance

ATTACHMENT A

CAM Indicators
Summary Table
JEC Unit 1

JEC Unit 1 CAM Indicators

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	FGD Liquid to Gas Ratio (L/G)	ESP transformer-rectifier sets (TR-sets) out of service	Opacity
Measurement Approach	The number of pumps in operation is monitored by the FGD control system and displayed in the FGD control room. The liquid flow rate is determined by multiplying the pump capacity by the number of pumps in operation. The gas flow rate is determined based on the certified CEMS installed at the exhaust stack for the unit. Both 6-minute and 1-hour averages will be utilized to develop a 3-hour block average L/G.	The operating status of each TR set is monitored by the ESP control system and displayed on a master remote terminal unit in each ESP control room.	Qualitative opacity assessments are conducted by knowledgeable observers.
II. Indicator Range	An excursion is defined as an L/G below 0.00040 for any 3-hour block average operating period excluding those events defined as startup, shutdown or malfunction.	An excursion is defined as more than 6 ESP bus sections (one bus section consists of two TR-sets) out of service at the same time in any one gas path, or more than 32 TR-sets out of service at the same time (regardless of the location), for any 3-hour block average operating period, excluding those events defined as startup, shutdown or malfunction.	An excursion is defined as a Qualitative Assessment (QA) during which the stack opacity appears to exceed 20 percent, excluding those events defined as startup, shutdown, or malfunction.
III. Excursion Follow-Up	As soon as practicable following an excursion of the L/G threshold, the plant will conduct a qualitative assessment (QA). If the excursion occurs at a time when a QA cannot be conducted (e.g., night time, weather which affects visibility, etc.) then the QA shall be conducted within 24 hours of the excursion. If the Unit is brought out of service for corrective action prior to the time when a QA can be conducted, the QA will be performed once the Unit is operational again.	If an excursion is documented during the weekly observation, the plant will conduct a qualitative assessment (QA) as soon as practicable following discovery of the excursion. If the excursion occurs at a time when a QA cannot be conducted (e.g., night time, weather which affects visibility, etc), then the QA shall be conducted within 24 hours of the excursion. If the Unit is brought out of service for corrective action prior to the time when a QA can be conducted, the QA will be performed once the Unit is operational again.	Not applicable.

JEC Unit 1 CAM Indicators (CONTINUED)

IV. Performance Criteria			
A. Data Representativeness	The FGD pumps provide the slurry flow that is responsible for SO_2 reduction and particulate removal.	The TR-set provides the power for the electric field that enables particulate collection within each ESP bus section. When an individual TR-set is out of service, the overall collection efficiency of the ESP is reduced. This effect is increased with the simultaneous failure of multiple TR-sets. The amount of reduction is determined by the number of TR-sets out of service and their location within the ESP.	Not applicable.
B. Verification of Operational Status	Not applicable. Monitoring approach uses existing equipment.	Not applicable. Monitoring approach uses existing equipment.	Not applicable.
C. QA/QC Practices and Criteria	The gas flow monitor is certified and operated in accordance with the requirements of 40 CFR Part 75.	All indicators are operated and maintained in accordance with manufacturer's specifications. Equipment is repaired or replaced as needed	The person responsible for making qualitative opacity assessments shall be knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting and wind, and the presence of uncombined water in the plume.
D. Monitoring Frequency	Continuous	Weekly	Weekly
E. Data Collection Procedures	In the event the liquid to gas ratio is less than 0.00040, the plant will automatically record the date and time of the event and the operating status of the FGD modules. If a QA is required, records of the QA shall be maintained and shall include the time and date of the assessment, a description of the emission point from which the unusual emissions emanated, the steps taken to correct the abnormal emissions and the name of the person conducting the QA. If the QA is postponed as allowed above, the reason for the postponement shall be documented.	At a minimum, once per week, the plant will manually record the date, time and operating status of all TR-sets in both ESP sections. If a QA is required, records of the QA shall be maintained and shall include the time and date of the assessment, a description of the emission point from which the unusual emissions emanated, the steps taken to correct the abnormal emissions and the name of the person conducting the QA. If the QA is postponed as allowed above, the reason for the postponement shall be documented.	Once per week a QA will be conducted of each boiler stack in operation at the time of the scheduled QA. Records of each QA shall be maintained and shall include the time and date of the assessment, a description of the emission point from which any unusual emissions emanated, the steps taken to correct the abnormal emissions and the name of the person conducting the QA.
F. Averaging Period	Three-hour block averages	Three-hour block averages	Not applicable.